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Office of The Secretary
Federal Communications Commission
Washington DC 20554

ORIGINAL

REF: NPRM 93-305

Dear Commissioners;

My sincere thanks to the Commission for undertaking the issue of vanity call signs for amateurs. I have been a licensed amateur for nearly 35 years and reform of the call sign issuance system has been a topic of controversy as long as I can remember. For over five years, I was the editor of The National Contest Journal (NCJ)¹. In the 20 year history of the Magazine, vanity call signs was one of the most debated topics. It was such a major issue that, during the brief period of vanity call sign issuance in the 1970's, the NCJ circulated lists of unassigned calls and dedicated an entire issue to publishing a cross-reference list of old and new call signs.²

You mention in the NPRM that amateurs "have a high regard" for call signs. Based on my experience, we, more accurately, have a passion about our call signs. Unlike vanity license plates that usually do little more than make a clever statement, call signs take on the identity of the licensee.³ They can become an international signature or, perhaps, a statement of accomplishment and tenure. In fact, there is a very specific hierarchy of call signs within the hobby. In descending order of prestige, they are:

W x 2	(W1AW, W4AA)
K x 2	(K3ZO, K6AA)
N x 2	(N4AR, N3AA)
W x 3	(W4KFC, W7XYZ)
K x 3	(K7UGA, K0XYZ)
2 x 1	(WJ2O, NA5R, KQ3Y)
WA x 3	(WA1STO, WA3XYZ)
WB x 3	(WB5DTX, WB4XYZ)
2 x 2	(AA6TT, KO4OX)
2 x 3	(KC5AFO, WD2XYZ)

This hierarchy generally follows the chronological history of the blocks of call signs issued since the Commission began formal call sign issuance. As the NPRM pointed out, however, shorter is generally considered more prestigious than longer. Double and triple letter suffixes are coveted (W1AA, W6RRR). Call signs that spell a word have special recognition appeal (W6OAT, WA3BOB).

The ARRL Headquarters station, W1AW, just would not carry the same international prestige and recognition if it were licensed WB1XYZ. W6BIP has, for decades, taken "BIP" as his given name. The King of Jordan has the call sign JY1, while other Jordanian amateurs have call signs such as JY3ZH. I received my first call sign (WV2GGB) in 1959 when the Commission first started issuing 2 x 3 call signs. For years, I was branded as a "newcomer" and taunted by well-meaning "old-timers."

Our hobby is rich with tradition. That tradition is the foundation for our growth and advancement through most of the 20th century. The reason that the Commission has received so many requests for vanity call signs is that the current issuance procedure is incongruous with our history and tradition. Our call signs virtually become our names, in the international fraternity of amateur radio, and we would like to have the opportunity to select our names and to have them indicate some status within the fraternity. Since the Commission has invited suggestions in this NPRM, I urge the consideration of the history and tradition of amateur radio when structuring the issuance of vanity call signs.

More specifically, I propose a system based not just on license class, but on tenure as well. For instance, it would be totally counterproductive to the Commission's good intentions to have an eleven year old amateur extra class licensee receive a 1 x 2 call sign.⁴ It would be equally counterproductive for an amateur who allowed his license to lapse not have a reasonable opportunity to retrieve his old call sign, if it were available. I, therefore, propose the following system for issuance of amateur radio call signs for the Commission's consideration.

GROUP 1	<u>TENURE</u>	<u>AVAILABLE BLOCK</u>
A. Amateur Extra	10 years	Any unassigned call
B. Advanced	10 years	1 x 3, 2 x 2, 2 x 3
C. General	10 years	2 x 3
D. Technician	10 years	2 x 3

GROUP 2

A. Amateur Extra	5 years	2 x 1, 1 x 3, 2 x 2, 2 x 3
B. Advanced	5 years	2 x 2, 2 x 3
C. General	5 years	2 x 3
D. Technician	5 years	2 x 3

GROUP 3

A. Amateur Extra	1 year	1 x 3, 2 x 2, 2 x 3
B. Advanced	1 year	2 x 2, 2 x 3
C. General	1 year	2 x 3
D. Technician	1 year	2 x 3

NOTES:

1. An amateur may request a previously held call sign, regardless of tenure or license class.
2. A club or military station may request a specific call sign commensurate with the class and tenure of the trustee.
3. All new licensees will be issued a sequential call sign. After one year, they may request a vanity call sign.
4. In the event of multiple requests for the same call sign, the amateur with the highest class license and the greatest tenure will be given first consideration.
5. To prevent an unmanageable work load, Group 1 will be eligible to apply within the first six months of the effective date of the Rules change. Group 2 will be eligible to apply 6 months after the effective date. Group 3 will be eligible to apply 1 year after the effective date.
6. Novice class licensees are excluded as an incentive for them to upgrade.⁵

I believe that this proposed system would be equitable, manageable and keep the traditions of amateur radio in step with need and technology.

The second consideration of vanity call signs is a reasonable fee structure. Since the entire matter is vanity, there is every reason to charge a significant fee that will pay for the administration of the program, pay for the overhead of amateur licensing and, perhaps, have enough left to contribute to the Enforcement Bureau. I suggest a fee of \$75 for a specific call sign or list of specific call signs, and \$50 for a non-specific call sign. That is, for \$75, an applicant can apply for a single specific call sign or a list of specific call signs and for \$50, "an advanced class with five or more years tenure" could request "any call sign in Group 2-B." Perhaps the list of hierarchy (from page 1) could be used as a sorting criteria for non-specific vanity call sign issuance. With a significant fee structure, the new amateurs would continue to not have to pay a fee, other than the service fee charged by the Volunteer Examiners.

The third matter deals with access to the pool of available call signs. Presently, the data bases available to the public from the Commission have a significant time lapse between license issuance and distribution of the data base. The data base is also plagued with errors.

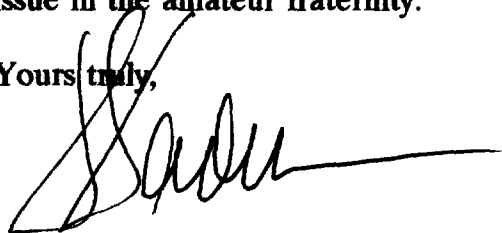
The ten year license term and the "transportability" of call signs⁶ are the major contributors to the data base errors. Amateurs can keep their calls sign no matter where they live in the Country, so there is little compelling reason to notify the Commission of address changes. That is further compounded by the mobility of society in general. Within ten years, an amateur may have moved four or five times and be difficult to track down. The only amateurs that notify the Commission of their address changes are the conscientious and the very active. An amateur may have passed away or become inactive and it can be nearly ten years before the Commission is aware of the status. Allowing traditional grace periods, it can be nearly 15 years before a call sign becomes available for reissue.

I suggest two strategies to minimize the Commission's work load and serve the amateurs. Continue to make the data base available through the current channels, but update it at least monthly. The amateur community will find ways to make the data available through electronic bulletin boards and publications. Make a hard and fast rule that call signs will not be available for reissue for five years after the expiration of the station license. This will preclude the Commission being bombarded with affidavits requesting call signs for inactive and deceased amateurs. It will also shield the families of deceased amateurs from requests to validate the availability of a call sign.⁷

On a professional note; I am a management consultant by trade and applaud the Commission's effort to become more "customer" oriented. I strongly advocate total quality and continuous improvement by making the customer the driving business force. I regularly see the overwhelmingly positive results of these initiatives.

Again, my sincere thanks to the Commission for undertaking this "vain" but important issue in the amateur fraternity.

Yours truly,

A handwritten signature in black ink, appearing to read 'Taormina', with a long horizontal flourish extending to the right.

Thomas Taormina, K5RC
Volunteer Examiner VE-13549

Footnotes:

1 . The National Contest Journal is an international magazine for amateur radio contesting enthusiasts. It is published by the American Radio Relay League (ARRL). Contesting is a very popular specialty within the hobby involving on-the-air tests of operating skill.

2 . During this period, the Commission faced the same dilemma of how to make the available call sign pool known. Since computers were at a premium, it was done manually by interested third parties.

3 . Although the official use of a call sign is a station license, it long ago took on the identity of the licensee.

4 . A call sign such as W1AW or K1ZZ is perceived to be an "old timer," or at least an amateur with considerable tenure.

5 . Although the Novice class license is now permanent, its original intent and the intent of the Commission's Incentive Licensing Program was to encourage Novices to upgrade and progress.

6 . Prior to recent Rules changes, an amateur license was valid for only 5 years and if an amateur moved to a different call area, he had to apply for a call sign from the appropriate call area. At the very least, the Rules used to force amateurs to state that they were "Portable" or "Mobile" when they were away from their licensed station location, giving incentive to file a change of address with the Commission.

7 . Club stations used to be able to apply for the call sign of a deceased member by obtaining an affidavit from the family or estate.